

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

v.

RICHARD SCHUELER aka RICHARD
HEART, HEX, PULSECHAIN, and
PULSEX

Defendants.

Case No. 1:23-CV-5749
AFFIDAVIT IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE

I, Michael Ingram, being duly sworn, hereby depose and say as follows:

1. I am an attorney with the law firm of Kirk & Ingram, LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the state of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have not been convicted of a felony.
6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.
7. Attorney Registration Number(s) if applicable: 310119.
8. Wherefore, your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-CV-5749, *SEC v Schueler, et al.*, for Defendant Richard Schueler aka Richard Heart.

Dated: January 16, 2024

Respectfully Submitted,

KIRK & INGRAM, LLP

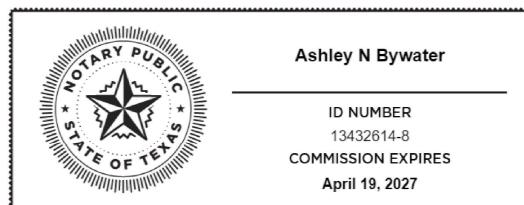
By: 
Michael W. Ingram
State Bar No. 310119
100 Wilshire Blvd., Suite 700
Santa Monica, CA
(310) 487-0270
mingram@kirkingsram.com

Counsel for Richard Schueler aka Richard Heart

Notarized:

State of Texas
County of Bexar
Sworn to and subscribed before me
on 01/16/2024 by Michael W. Ingram.





Notarized online using audio-video communication